UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

JORGE THEN,

a/k/a "George Then,"
a/k/a "Ramaiy Segarra,"
a/k/a "Chikis,"

Defendant.

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08 CRIM 748

COUNT ONE

The United States Attorney charges:

1. In or about May 2008, in the Southern District of New York and elsewhere, JORGE THEN, a/k/a "George Then," a/k/a "Ramaiy Segarra," a/k/a "Chikis," the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, THEN, and others known and unknown, agreed to commit a robbery of individuals in an apartment in the Bronx, New York, whom they believed to be in possession of kilogram quantities of cocaine.

(Title 18, United States Code, Section 1951(a).)

MICHAEL J. GARCIA MUR United States Attorney